Rambus Inc. v. International Business Machines Corporation

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Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Rambus Inc. ("Rambus") and Defendant International Business Machines Corporation ("IBM"), through their respective counsel of record, respectfully request, and with the Court's permission, stipulate to a four-week extension of the current case schedule to allow the parties further time to finalize the settlement agreement and related papers. More specifically, with the Court's permission, the parties hereby stipulate that the current schedule set forth in the May 31, 2011, Stipulated Order [Dkt. 64] be modified as follows:

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Patent L.R. 4-2(a), (b))	June 13, 2011	July 11, 2011
Meet and confer re Joint Claim Construction and Prehearing Statement (Patent L.R. 4-2(c))	June 20, 2011	July 18, 2011
Last day to request leave to designate additional terms for claims construction JSW Standing Order ¶ 4	June 24, 2011	July 22, 2011
Joint Claim Construction and Prehearing Statement (Patent L.R. 4-3) – Includes Expert Testimony. Parties must attach copies of patents, make available file histories to Court for each involved patent	July 8, 2011	August 5, 2011
Completion of Claim Construction Discovery (Patent L.R. 4-3)	August 8, 2011	September 6, 2011
Rambus Opening Claim Construction Brief (Patent L.R. 4-5(a)). 25 page limit	August 22, 2011	September 19, 2011
IBM Responsive Claim Construction Brief (Patent L.R. 4-5(b)). 25 page limit	September 6, 2011	October 4, 2011

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EVENT	CURRENT SCHEDULE	PROPOSED DATE
Rambus - Reply Brief and any evidence directly rebutting the supporting evidence (Patent L.R. 4-5(c)) 15 page limit	September 12, 2011	October 11, 2011
Amended Joint Claim Construction Statement		1
Tutorial for the Court	October 5, 2011	November 2, 2011, or any later date, subject to the convenience of the Court's calendar
Claim Construction ("Markman") Hearing (Patent L.R. 4-6).	18 October 19, 2011	November 16, 2011, or any later date, subject to the convenience of the Court's calendar
By his signature below, counseling of this stipulation.	el for Defendant attests that cour	nsel for Plaintiff concurs in the
	Respectfully submitted,	

Date: June 10, 2011 FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P.

By /s/ Tina E. Hulse
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8	Rambus Inc.
9	Detade June 10, 2011 Detade June 10, 2011 Detade June 10, 2011
10	Dated: June 10, 2011 By: /s/ Edward A. Kmett Edward A. Kmett (SBN: 204374) FITZPATRICK, CELLA, HARPER & SCINTO
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, AS MODIFIED ABOVE

Dated: June <u>15</u>, 2011

The Hondrable Jeffrey S. White Unite States District Judge Northern District of California